



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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ANGUS S. KING, JR.  
GOVERNOR

July 24, 1998

EDWARD O. SULLIVAN  
COMMISSIONER

Mr. Emil Klawitter  
Code 1823 EK  
Department of the Navy, Northern Division  
Naval Facilities Engineering Command  
10 Industrial Highway, Mail Stop 82  
Lester, PA 19112-2090

Re: Restoration Advisory Board (RAB) Technical Meeting Summary  
Long-Term Monitoring Plan Revisions & Data Quality Objectives  
May 18-20, 1998

Dear Emil:

The Department of Environmental Protection (DEP or Department) has received the draft minutes for the technical RAB held May 18 through 20th, 1998 regarding the Long Term Monitoring Plan for Sites 1,3 Eastern Plume and Site 9. Based on that review the Department has the following comments and corrections.

**General Comments**

1. Introductory Section, page 1, 2nd para:

The first sentence implies that changes given below are final and will be implemented per this memorandum. The Department views the given changes as a summary draft for soliciting written concurrence from DEP and EPA as a follow-up to tentative verbal agreement at the meeting held May 18-20, 1998.

2. Introductory Section, page 1, 2nd para:

DEP's meeting notes indicate that the new LTMP schedule would be implemented in the spring of 1999, but that wells to be added or dropped will occur effective at the November 1998 monitoring event. For clarification, is this the Navy's intent?

**Specific comments**

3. Leachate, Surface Water, and Sediment, page 2 para 1:

"Therefore, surface water and sediment sampling will be discontinued although sampling at the aqueous leachate seep will continue."

This matter is still under discussion based on information to be provided by the Navy on previous data, the rationale for no further sampling, and what testing is being done for the Nation Pollution Discharge Elimination System (NPDES). The DEP and Carolyn LePage distinctly stated that they wanted to have the option of requiring sampling or if the NPDES testing was eliminated that the LTMP would pick up sampling for the contaminants of concern. The minutes need to be changed to indicate this is still under

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4. Site 9, Leachate, Surface Water, and Sediment, page 2, Table:

DEP has not given up on determining the location of the VOC source area for this site, and believes that good definition of water table contours between Neptune Drive and Burbank Avenue is necessary. Our file research indicates that the most recent satisfactory coverage contour map which includes this area is based on measurements of September 29, 1995. Furthermore, the new recorded high water level at MW-NASB-075 during Event 11 and the historical large fluctuation of water level at MW-NASB-080 (relative to all other monitoring wells at Site 9) are noted in the graph received from EA (June 16, 1998 fax). We are reopening this inquiry because vinyl chloride concentrations have recently increased significantly at several monitoring wells and groundwater flow paths have not been remapped after damming of the streams at Site 9. An expanded gauging network at Site 9 likely can be trimmed back substantially after one or two years of data have been collected.

DEP agrees with the wells listed for Bi-Annual Gauging, but requests that other upgradient wells, listed below, be added providing each is screened in the shallow water table.

MW-NASB-008	MW-NASB-020
MW-NASB-009	MW-NASB-025
MW-NASB-010	MW-NASB-204

5. Sites 1 & 3, Ground Water, page 3, para 1:

"Several monitoring wells inside the confines of the landfill slurry..."

Because the majority of wells (14 of 24) are being dropped from the sampling program, please change "Several" to "Fourteen".

6. Sites 1 & 3, Leachate, Surface Water, and Sediment, page 3, para 1:

"One leachate sample location (SEEP-2) has been consistently dry and therefore, will be dropped from the program. Two surface water locations (SW-05 and SW-06) will be removed and ..."

DEP's notes indicate these seeps were to be checked and sampled if possible for VOCs and TAL. However, DEP understands that they were not to included as regularly sample locations for quality assurance/quality control reasons.

7. Sites 1 & 3, Leachate, Surface Water, and Sediment, page 3, Table:

DEP notes did not include MW 210R. This may have been an oversight we can discuss these at the next meeting. Also EW-6 and EW-7 are shown on the next table as gauging only. This needs to be clarified.

8. Sites 1 & 3, Leachate, Surface Water, and Sediment, page 4, Table:

DEP notes indicate that SW-1, SW-2, SW-3 were dropped because they are on a small intermittent stream. This should be clarified.

9. Sites 1 & 3, page 4, Table:

Some typos were noted: EP-7 should be EW-7 and the second SW-8(New) should be SW-9(New).

The no sampling requirements for EW-6 and EW-7 is contingent on the wells not being pumped for remediation purposes. Should water levels rise to the base of the fill, remedial pumping needs to resume at these wells. In that case, sampling should resume and the wells become an active component of the LTMP. This requirement should be footnoted in this table.

- DEP agreed to inactivate the sampling of SEEP-2 because it has been dry but not to delete it from the LTMP. The past month has been unusually wet, and the seep may flow again. If it does flow, the agreement was that it would be sampled. Another table footnote is needed.

Upon reconsideration, DEP requests that sediment sampling location SED-07 be retained in the LTMP, as lead concentrations slightly exceeded the MEG of 15 mg/kg in 1997.

10. EASTERN PLUME, Ground Water, page 4, 1st para:

The proposed shallow well should be named differently so as not to have the same label as Well-01 proposed for Sites 1 & 3. Well-02 will work in this memorandum (remember to also make the same change in the table).

11. EASTERN PLUME, pages 5 & 6, Tables:

The State asks that MW-224 not be dropped even though detections have been rare. Without this location, there would be no monitored well upgradient of extraction well EW-03 (between the source area and EW-03).

DEP notes indicate that MW 309A and MW 309B were proposed to be dropped. DEP sees no reason to keep sampling both MW-309A and MW-309B. Both wells are screened in shallow bedrock. Our choice would be to keep MW-309B. This should be discussed at our next meeting.

Concerning the P-Series Piezometers, DEP notes that P-132 is close to well MW-305, and is screened roughly 20 feet shallower. However, the heads differ by about 7 feet; thus, a strong upward gradient is present here, apparently created by a sequence of clay/silt layering. DEP concurs that both wells should continue to be gauged.

We did not discuss the EP-Series piezometers at the May meeting. Our understanding is that these are short-screened observation wells that served to monitor prior pumping tests. The Navy should consider gauging the one piezometer nearest to each extraction well to access changes in the drawdown cone shape over time. Any significant/progressive increase between drawdowns in an extraction well/piezometer "pairing" may be useful in recognizing a need for extraction well redevelopment, if changes in the rate of extraction are not significant.

13. MONITORING EVENT REPORTING, page 7:

Some maps changes were also requested by the regulators as follows:

Remove the Eastern Plume boundary from the Event Reports, but include in the annual report.

Remove unsampled wells (non-LTM) from the maps.

page 4 of 4

Please feel free to call me at (207) 287-7713 if you have any questions or comments regarding this matter.  
I look forward to discussing the LTMP further at the upcoming RAB meeting.

Respectfully,

A handwritten signature in cursive script, appearing to read "Claudia Sait". The signature is written in black ink and is positioned above the printed name and title.

Claudia Sait  
Project Manager-Federal Facilities  
Bureau of Remediation & Waste Management

cf: File  
Larry Dearborn-DEP  
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Peter Nimmer- EA  
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